

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TODD SCOTT**

**Plaintiff,**

**v.**

**NATIONAL FOOTBALL LEAGUE, INC.  
and NFL PROPERTIES, LLC as successor  
in interest to NATIONAL FOOTBALL  
LEAGUE PROPERTIES, INC.,**

**Defendants.**

**Case No. 2:12-cv-04241**

**MOTION FOR LEAVE TO AMEND  
CIVIL ACTION COMPLAINT FOR  
DECLARATORY RELIEF, MEDICAL  
MONITORING, INJUNCTIVE  
RELIEF AND DAMAGES**

**JURY TRIAL DEMAND FOR ALL  
CLAIMS TRIABLE BY A JURY**

For the reasons set forth in the Brief in Support of this Motion, pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff respectfully requests leave to amend his Complaint, filed on July 2, 2012. The proposed Amended Complaint is attached hereto as Exhibit A. Specifically, Plaintiff seeks to amend his Complaint to add Riddell, Inc. (d/b/a Riddell Sports Group, Inc.), All American Sports Corporation (d/b/a Riddell/All American), Riddell Sports Group, Inc., Easton-Bell Sports, LLC, and Easton-Bell Sports, Inc., as defendants in this matter. Plaintiff requests that the attached Amended Complaint be deemed so filed.

A proposed Order is filed herewith.

This the 24th day of July, 2013.

Respectfully Submitted,

**WASHINGTON & ASSOCIATES, PLLC**

/s/ Mickey Washington

Mickey Washington

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